

JASON M. WILEY, ESQ.
Nevada Bar No. 9274
E. DANIEL KIDD, ESQ.
Nevada Bar No. 10106
WILEY PETERSEN
1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
Telephone: 702.910.3329
Facsimile: 702-553-3467
jwiley@wileypetersenlaw.com
dkidd@wileypetersenlaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

APEX OPERATIONS, LLC, a Nevada limited liability company; 420702 CONSULTING, LLC, a Nevada limited liability company; ZOHA DEVELOPMENT, LLC, a Nevada limited liability company; MACMAS REAL ESTATE AND AGRICULTURAL PRIVATE EQUITY OPPORTUNITY FUND, LLC a foreign country limited liability company; MICHAEL SASSANO, an individual; RONALD SASSANO, an individual,

Plaintiffs,

v.

PAVEL ROSENBERG, and individual; MCIG, INC., a Wyoming corporation; BOTS, INC. a Puerto Rico corporation; OBITX, INC., a foreign corporation; DOE individuals I through X, inclusive; and ROE entities I through X, inclusive,

Defendants.

CASE NO.: 2:22-cv001169-RFB-DJA

STIPULATION AND ORDER TO EXTEND TIME TO FILE PLAINTIFFS' RESPONSE TO DEFENDANT EVERYTHING BLOCKCHAIN, INC.'S MOTION TO DISMISS UNDER FRCP 12(b)(2) AND, ALTERNATIVELY, FRCP 12(b)(6)

[FIRST REQUEST]

Plaintiffs Apex Operations, LLC, 420702 Consulting, LLC, Zoha Development, LLC, MacMas Real Estate and Agricultural Private Equity Opportunity Fund, Michael Sassano, and Ronald Sassano, (collectively, "Plaintiffs") by and through their attorneys of record, the law firm Wiley Petersen, and Defendant Everything Blockchain, Inc. ("EBI") by and through its attorney of record, the law firm McDonald Carano (collectively, Plaintiffs and EBI referred to hereinafter as "the Parties"), and

pursuant to LR IA 6-1, submit the following stipulation to extend the time for Plaintiffs to file a response to *Defendant Everything Blockchain, Inc.'s Motion to Dismiss Under FRCP 12(b)(2) and, Alternatively, FRCP 12(b)(6)* ("Motion to Dismiss") [ECF No. 5]. In support of the stipulation, the Parties state that:

1. On July 20, 2022, EBI removed the litigation to this Court [ECF No. 1].
2. On July 27, 2022, EBI filed its Motion to Dismiss.
3. Plaintiffs require additional time to analyze the merits of the Motion to Dismiss and file a response.
4. EBI's counsel has acknowledged and agreed to the requested extension.
5. This is the first request to extend Plaintiffs' deadline to file a responsive pleading to the Motion to Dismiss.
6. The request for an extension of time to file a responsive pleading is not intended to cause any undue delay or prejudice to any party and is not made for an improper purpose.

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7. The Parties stipulate that the deadline for Plaintiffs to file their responsive pleading to the Motion to Dismiss shall be extended through August 24, 2022.

DATED: August 10, 2022

MCDONALD CARANO LLP

WILEY PETERSEN


/s/ George F. Ogilvie III, Esq.
GEORGE F. OGILVIE III, ESQ.
Nevada Bar No. 3552
AMANDA C. YEN, ESQ.
Nevada Bar No. 9726
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
T: 702.873.4100
gogilvie@mcdonaldcarano.com
ayen@mcdonaldcarano.com

*Attorney for Defendant
Everything Blockchain, Inc.*

/s/ Jason M. Wiley, Esq.
JASON M. WILEY, ESQ.
Nevada Bar No. 9274
E. DANIEL KIDD, ESQ.
Nevada Bar No. 10106
1050 Indigo Drive, Suite 200-B
Las Vegas, Nevada 89145
T: 702.910.3329
jwiley@wileypetersenlaw.com
dkidd@wileypetersenlaw.com

Attorneys for Plaintiffs

ORDER


RICHARD E. BOULWARE, II
United States District Court
DATED this 11th day of August, 2022.